November 3, 2005

Craig Myers, OSC
US Environmental Protection Agency
999 18th Street, Suite 500 (MC 8EPR-ER)
Denver, Colorado 80202-2466

Reference: Subcontract No. 68-W-02-072

Subject: Work Plan for Stimson Lumber
EQ Project No. 030218.0012
EPA Delivery Order No. 072-08-012

Dear Mr. Myers:

Enclosed please find the site-specific Environmental Quality Management (EQ) Work Plan for the removal action at the Stimson Lumber Site, located in Libby, Montana. The Contracting Officer issued this Delivery Order to EQ on July 15, 2004.

EQ will mobilize to the Stimson Lumber site around April 18, 2005 to perform roof abatement activities. Additionally, EQ will perform any other necessary site work as directed by the OSC and the approved Scope of Work.

If you have any questions or comments please contact me at (425) 673-2900.

Sincerely,

ENVIRONMENTAL QUALITY MANAGEMENT, INC.

Ron McManamy
Deputy Program Manager

RM/lt

Enclosure

cc: Lisa Walker, CO
Mike Zimmerman, PO
Betsy Kuhlenberg, EQ Subcontracts Manager
Rick Singer, EQ RM
File

Stimson Lumber Site
Removal Action Work Plan
Delivery Order No. 072-08-012
EQ Project No. 030218.0012

1.0 Delivery Order Goals

The primary goal of the removal action is to reduce off-site migration or the threat of off-site migration of contaminates. Cleanup actions are planned as a means to reach this goal. In order to reduce off-site migration of contaminates, a combination of the tasks outlined in Section 2.0 may be required:

2.0 Site Background

The Libby Asbestos site includes an inactive vermiculite mine located on Vermiculite Mountain in northwestern Montana, and portions of the town of Libby. The mine is approximately seven miles east northeast of the town. Although mining of Vermiculite Mountain dates back to the 1890s, large-scale mining was initiated by the Zonolite Company in the 1920s. W.R. Grace acquired the Zonolite Company in 1963 and continued mining operations until September 1990. The vermiculite mine has been operating under Montana Department of State Lands Operating Permit 00010 since 1972, under a State-approved reclamation plan. Of approximately 1,200 acres of patented mining claims, 865 are known to be disturbed by mining activities.

The ore body from which the vermiculite ore was mined contains significant occurrences of amphibole asbestos. Processing of the vermiculite ore, with amphibole asbestos intermixed, caused high dust and airborne releases of fine asbestos fibers. These fine asbestiform fibers have been linked by the Agency for Toxic Substances and Disease Registry (ATSDR) to certain kinds of lung disease and abnormalities. Amphibole asbestos contamination associated with the ore processing has been found in processing plants, residential yards, and schoolyards in the town of Libby and between the mine and the town.

Residences, schools, and businesses received vermiculite free of charge from W.R. Grace. On residences, vermiculite was used in gardens and for fill in other parts of residential properties. Some school areas, such as running tracks and football fields utilized vermiculite as fill. EPA's Removal Program has sampled many of these areas and has conducted removal actions at most, if not all, schools and at some residences and businesses. Many residences and businesses still have substantial quantities of asbestiform fibers that may pose a threat to the inhabitants or workers. EPA is conducting on-going emergency removal actions to address asbestos contamination in yards, schools, and other processing areas in town.

The Stimson Mill has operated under various entities since the turn of the 20th Century. The Mill ceased operation in the 1990's. Vermiculite/asbestos from W.R. Grace was used to insulate several of the walls and in a concrete mixture used on the roof of the Mobile Shop.

The site is located on Highway 2 West, Libby, Lincoln County, Montana. The Former Mobile Shop is located in the southern portion of the Former Stimson Lumber Mill site. The Former Mobile Shop is accessible from Highway 2 West. The Kootenai River is north of the site.

Portions of the Mobile Shop are currently leased to local businesses including a wood stove manufacturer and a stone mason. The former Mill offices are leased to local businesses.

3.0 EPA Directed Tasks to Accomplish and the Anticipated Schedule

EQ has been tasked by US EPA Region 8 to perform the following activities at the Site:

- Mobilization and Set up – 3 days;
- Site preparation;
- Install barrier fencing where required;
- Setup personnel decontamination trailer;
- Delineate exclusion zone, support zone and decontamination line;
- Receive and stage equipment.
- Receive and stage disposal containers
- Roof Removal
- ACI Removal
- Wall cleaning and Encapsulated
- Re-Roofing;
- Demobilization

Mobile Shop Roof

The Mobile Shop roof consists of a tongue and groove lumber overlain with a 6-8 inch layer of concrete/vermiculite/concrete mixture. The concrete/vermiculite layer is covered with tarpaper. EQ will . .

- Remove asbestos containing roofing materials
- Remove additional roofing materials if necessary
- Replace roof as directed

Prior to mobilizing to the site a structural engineering study was performed to determine the structural integrity and structural stability of the roof. A structural support system, worker fall restraint system, a roof perimeter catch system and a disposal chute attachment system were designed from the results of the study.

- Install 6 ¾ x 10 ½ laminated beams to trusses for structural support
- Install fall restraint system
- Install roof perimeter catch system
- Construct waste disposal chute
- Remove concrete/vermiculite layer
- Install new roof

The concrete/vermiculite layer will be removed in sections. The dimensions of the sections will be determined during mobilization/setup activities.

Concrete saws will be used to cut the concrete/vermiculite/asbestos layer into manageable pieces. Electric jackhammers, pry bars shovels and other tools will be used to dislodge the concrete/vermiculite/asbestos layer sections and transfer the materials to the disposal chute. Water will be used to keep the concrete/vermiculite/asbestos layer wet and reduce fugitive dust emissions.

Mobile Shop Walls

Some of the Mobile Shop walls are constructed of tongue and groove lumber. The cavities between the tongue and groove lumber is filled with asbestos contaminated insulation (ACI). EQ will . . .

- Remove VCI from wall cavities
- Remove the interior tongue and groove wall
- Clean wall cavity
- Encapsulate exterior walls

The site activities will be performed in stages. The roof abatement activities will be performed as the first stage. The associated setup and tear down and equipment decontamination will be performed at the completion of this stage. The wall abatement will be performed as the second stage and the associated. The associated setup and tear down and equipment decontamination will be performed after the wall abatement is completed.

- Install critical barriers
- Establish entry and exit ways
- Establish negative air environment
- Set up vacuum system
- Remove ACI from walls via vacuum system
- Remove interior tongue and groove wall
- Clean and encapsulate remaining tongue and groove wall.
- Vacuum exterior perimeter of Mobile Shop in areas adjacent to where abatement activities were performed.

The wall abatement will be performed in sections. The dimensions of the sections will be determined during mobilization/setup activities.

Decontamination and Demobilization.

Due to the abatement work being completed in stages, decontamination and demobilization associated with the stages will be performed upon their completion.

- Remove structural supports, fall restraints, catch system, disposal chute
- Decontaminate equipment.
- Demob equipment, decon trailer and office trailer.

4.0 Site Specific Health and Safety Plan

A Site Specific Health and Safety Plan has been developed for the Stimson Mill Site. This document describes the health and safety guidelines developed for the protection of on-site personnel, visitors and the public from physical harm and exposure to hazardous materials or wastes. The procedures and guidelines were based upon the best available information at the time of the plan's preparation. Specific requirements will be revised when new information is received or conditions change.

All work practices and procedures implemented on site must be designated to minimize worker contact with hazardous materials and to reduce the possibility of physical injury. All work will be performed in accordance with applicable Federal 29 CFR 1910 and 1926 Health and Safety Regulations and specifically 29 CFR 1910.120, Hazardous Operations and Emergency (HAZWOPER).

5.0 Sampling

Air monitoring, air sampling and analyses, soil sampling and analyses performed in conjunction with the project will be executed by EPA's designated contractor and at EPA's direction.

6.0 Cost Estimate

Reference Attachment A, "Cost Estimate".

7.0 Schedule

Reference Attachment B, "Project Schedule".

The OSC or CO may request EQ to provide additional cost estimates for specific Tasks. These costs estimated may be used to evaluate different options to determine the feasibility of amending / or adding tasks. Any additional cost estimates requested by the OSC or CO will e included as addendums o this document.

8.0 Technical Documents

Reference Attachment C, "Technical Documents".

Attachment A

Cost Estimate

Attachment B

Project Schedule

Attachment C

Technical Documents